

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

FOUR BATONS WIRELESS, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:24-cv-00284-JRG

JURY TRIAL DEMANDED

JOINT MOTION FOR FIRST AMENDED DOCKET CONTROL ORDER

Plaintiff Four Batons Wireless, LLC (“Four Batons”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Defendants” or “Samsung”), (collectively, the “Parties”) hereby jointly request that the Court amend its Docket Control Order (Dkt. No. 35) as reflected in the First Amended Docket Control attached hereto.

Pursuant to the Court’s Docket Control Order (Dkt. No. 35), the deadline to comply with P.R. 4-2 (exchange preliminary claim constructions) and P.R. 4-3 (joint claim construction statement) are April 28, 2025, and May 19, 2025, respectively. The parties request a one-week extension of these deadlines to May 5, 2025 (P.R. 4-2 deadline) and May 26, 2025 (P.R. 4-3 deadline). The parties do not anticipate that this modest extension will require an extension of other related deadlines at this time.

Good cause supports the Parties’ request. The Parties request the foregoing extension of the P.R. 4-2 and P.R. 4-3 deadlines to adequately prepare the Parties’ proposed constructions and narrow the issues for claim construction. The Parties represent that this extension is not sought for

purposes of delay, but rather so that justice can be served. The Parties are jointly seeking the relief sought herein.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion to Amend the Scheduling Order (Dkt. No. 35) as attached hereto.

Dated: April 25, 2025

/s/ Meng Xi by permission Allen J. Hernandez

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Attorney for Defendants

*Samsung Electronics Company, Ltd., and
Samsung Electronics America, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 25th day of April, 2025, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Melissa R. Smith
Melissa R. Smith

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Melissa R. Smith
Melissa R. Smith